

Attorneys at Law

428 Boulevard of the Allies Pittsburgh, Pennsylvania 15219 Telephone: (412) 471-0677 Facsimile: (412) 263-6093

Stanley M. Stein Direct Dial: (412) 263-6111 E-mail: sms@fgsmlaw.com

November 3, 2005

The Honorable Amy Reynolds Hay United States District Court Western District of Pennsylvania 829 U. S. Courthouse 7th and Grant Street Pittsburgh, PA 15219

Re:

White v. George

Civil Action No. 00-2466

Dear Judge Hay:

Pursuant to your Order of Court reinstating the discovery schedule in the above-captioned matter, I had scheduled various depositions for November 14 and November 17, in addition to my, Motion to Compel, following the dismissal of Defendant's appeal by the Appellate Court.

I am advised that counsel for Defendant is planning to file Motions for Protective Order regarding some or all of the above-identified discovery.

Inasmuch as I will be out of the country beginning November 4 and will not be returning until November 14, I have agreed with counsel to postpone the depositions currently scheduled for November 14 and November 17 pending the Court's rulings on these discovery issues. In addition, I thought it best to advise the Court of my absence from the country until November 14, as I will be unable to respond to Defendant's Motions or engage in oral argument until my return. Beth Mills, the other attorney from my office who might have been available, has since left my office and is currently employed elsewhere, and so she would not be available either.

This letter, sent with the consent of Defendant's counsel, is simply to request that I have a few days following my return to respond to Defendant's Motions in writing as it is my recollection that the Court does not favor oral argument on these kinds of matters.

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EXHIBIT

Feldstein Grinberg Stein & McKee

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With thanks for your consideration, I remain

Very truly yours,

Stanley M. Stein

SMS:lab

cc: John P. Corcoran, Jr., Esquire Steven M. Petrikis, Esquire